

**REMARKS**

This is in response to the Final rejection of the pending claims in the Office Action mailed April 11, 2007.

Claims 1, 2, 4 through 8, 10 through 14, 16 through 20, and 22 through 24 are currently pending in the application.

Claims 1, 2, 4 through 8, 10 through 14, 16 through 20, and 22 through 24 stand rejected.

Applicants have amended claims 1, 6, 7, 10, 13, 16, 19, 22, and 24, and respectfully request reconsideration of the application as amended herein.

**35 U.S.C. § 112 Claim Rejections**

Claims 1, 2, 4 through 8, 10 through 14, 16 through 20, and 22 through 24 are rejected under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor(s), at the time the application was filed, had possession of the claimed invention.

Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants have amended independent claims 1, 7, 13, and 19 to delete the word both. Applicants assert that claims 1, 2, 4 through 8, 10 through 14, 16 through 20, and 22 through 24 comply with the provisions of 35 U.S.C. § 132 and 35 U.S.C. § 112, first paragraph, as the claims are supported by the specification. Therefore, claims 1, 2, 4 through 8, 10 through 14, 16 through 20, and 22 through 24 are allowable under 35 U.S.C. § 112.

Claims 1, 7, 13, and 19 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Applicants have amended the claimed invention for the presently claimed invention to particularly point out and distinctly claim the subject matter of the invention to comply with the provisions of 35 U.S.C. § 112. Therefore, presently amended claims 1, 7, 13, and 19 are allowable under the provisions of 35 U.S.C. § 112.

**35 U.S.C. § 103(a) Obviousness Rejections**

Obviousness Rejection Based on U.S. Patent 5,827,771 to Ginn et al. in view of U.S. Patent 5,798,558 to Tyson et al.

Claims 1, 2, 4, 7, 8, 10, 13, 14, 16, 19, 20, and 22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ginn et al. (U.S. Patent 5,827,771) in view of Tyson et al. (U.S. Patent 5,798,558). Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Third, the cited prior art reference must teach or suggest all of the claim limitations. Furthermore, the suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicants' disclosure.

After carefully considering the cited prior art, the rejection, and the Examiner's comments, Applicants have amended the claimed inventions to clearly distinguish over the cited prior art.

Applicants assert that any combination of the Ginn et al. reference and the Tyson et al. reference does not and cannot establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1, 7, 13, and 19 because, at the least, any combination of the Ginn et al. reference and the Tyson et al. reference does not teach or suggest all the claim limitations of the claimed inventions.

Turning to the cited prior art, the Ginn et al. reference teaches or suggests applying a compensating layer 18 to compensate for the bowing of a substrate used for an integrated circuit. The compensating layer 18 used is either  $\text{SiO}_2$  or  $\text{Si}_3\text{N}_4$ .

The Tyson et al. reference teaches or suggests a transimpedance amplifier having a passivation layer.

Applicants assert that any combination of the Ginn et al. reference and the Tyson et al. reference does not, at the least, teach or suggest the claim limitations of presently amended independent claims 1, 7, 13, and 19 calling for "a stress-balancing layer covering at least a portion of the back side substantially balancing the stress caused by the passivation layer covering a portion of the integrated circuit, the stress-balancing layer comprising at least one of a metal, a metal alloy, a metallorganic material, a photoresist material, a multilayer material for balancing stresses in more than one direction when balancing both the tensile stresses and compressive stresses of the semiconductor substrate omnidirectionally, a tape material for balancing stresses omnidirectionally, an adhesive material having reinforcement materials therein, and a temporary adhesive material, a chemical vapor deposition material". Neither the Ginn et al. reference nor the Tyson et al. reference nor any combination of the Ginn et al. reference and the Tyson et al. reference contains any such teaching or suggestion whatsoever to establish a *prima facie* case of obviousness under 35 U.S.C. § 103 regarding the claimed inventions of presently amended independent claims 1, 7, 13, and 19. At best, the Ginn et al. reference only teaches or suggests balancing stresses in one dimension, the bowing dimension referred to as warping illustrated in a convex drawing of the stress in one dimension while Tyson et al. does not discuss any stress balancing whatsoever. Applicants assert that any reasonable fair reading of the Ginn et al. reference and the Tyson et al. reference only results in a teaching or suggestion of balancing stresses in one dimension, the bowing dimension referred to as warping illustrated in a convex drawing of the stress in one dimension. In contrast to any teaching or suggestion of any combination of the Ginn et al. reference in view of the Tyson et al. reference, the claimed inventions of presently amended independent claims 1, 7, 13 and 19 require the multilayer material and the tape material to balance the stresses omnidirectionally. Applicants assert that such is clearly supported by, at least, specification numbered paragraph [0058] to clearly comply with the provisions of 35 U.S.C. § 132. Accordingly, presently amended independent claims 1, 7, 13, and 19 are allowable as well as the dependent claims therefrom.

Obviousness Rejection Based on U.S. Patent 5,827,771 to Ginn et al. in view of U.S. Patent 5,798,558 to Tyson et al. as applied to claims 1, 7, 13, and 19 above, and further in view of U.S. Patent 5,731,954 to Cheon

Claims 5, 6, 11, 12, 17, 18, 23, and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Ginn et al. (U.S. Patent 5,827,771) in view of Tyson et al. (U.S. Patent 5,798,558) as applied to claims 1, 7, 13, and 19 above, and further in view of Cheon (U.S. Patent 5,731,954).

Applicants respectfully traverse this rejection, as hereinafter set forth.

Applicants assert that dependent claims 5, 6, 11, 12, 17, 18, 23, and 24 are allowable as they depend from allowable presently independent claims 1, 7, 13, and 19.

Applicants submit that claims 1, 2, 4 through 8, 10 through 14, 16 through 20, and 22 through 24 are clearly allowable over the cited prior art.

Applicants request the allowance of claims 1, 2, 4 through 8, 10 through 14, 16 through 20, and 22 through 24 and the case passed for issue.

Respectfully submitted,



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